

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NORTH CAROLINA
CHARLOTTE DIVISION
CIVIL ACTION NO.: 3:19-cv-624

DAVID DUVALL,

Plaintiff,

v.

NOVANT HEALTH, INC.

Defendant.

MOTION FOR EXTENSION
OF TIME

COMES NOW the Plaintiff, by and through the undersigned counsel, and, pursuant to Rule 26 of the Federal Rules of Civil Procedure, hereby moves the Court for additional time to respond to the discovery requests propounded by the Defendant. In support of this Motion, Plaintiff shows unto the Court the following:

1. Defendant served its first discovery requests to Plaintiff on January 6, 2020, and; the responses are due February 10, 2020.
2. Plaintiff's counsel needs more time to complete Plaintiff's responses to Defendant's discovery requests;
3. The time for Plaintiff to answer and otherwise respond to Defendant's first discovery requests has not yet expired; and,
4. Defendant has been consulted and does not object to the request for additional time.
5. In turn, Plaintiff consents to a similar extension of time to Defendant to respond

to Plaintiffs' first discovery without filing a motion with the Court.

WHEREFORE, Plaintiff respectfully moves this Court for an extension of time of 30 additional days, until March 11, 2020, in which to answer and otherwise respond to Defendant's first discovery requests.

Respectfully submitted, this the 5th day of February, 2020.

/s/ S. Luke Largess

S. Luke Largess (N.C. Bar #17486)
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CERTIFICATE OF SERVICE

I, S. Luke Largess, hereby certify that I have this day electronically served the foregoing **MOTION FOR EXTENSION OF TIME** using the CM/ECF system, which will send notification of the filing to all counsel of record.

Respectfully submitted, this 5th day of February, 2020.

/s/ S. Luke Largess

S. Luke Largess
Attorney for the Plaintiff